



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM

DATE: October 26, 2020

SUBJECT: Efficacy Review for
S&S Sanitizer, EPA Reg. No. 1677-260 (primary); and
CW32A RTU, EPA Reg. No 1677-259 (secondary)
DP Barcode: 459246; E-submission No. 54511

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APPLICANT: Ecolab

Formulation from the Label:

S&S Sanitizer, EPA Reg. No. 1677-260 (primary)

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Dodecylbenzenesulfonic acid.....	12.8%
Lactic acid	34.1%
<u>Other Ingredients</u>	53.1%
Total	100.0%

CW32A RTU, EPA Reg. No 1677-259 (secondary)

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
Dodecylbenzenesulfonic acid.....	12.8%
Lactic acid	34.1%
<u>Other Ingredients</u>	53.1%
Total	100.0%

I BACKGROUND

Product Description (as packaged, as applied): Concentrated Liquid (Dilutable) – primary; RTU spray - secondary

Submission type: Label Amendment

Currently registered efficacy claim(s): Food contact sanitizer, nonfood contact sanitizer, disinfectant (bactericide and virucide)

Requested action(s): Add SARS-CoV-2 claim and electrostatic spray application

Documents considered in this review:

S&S Sanitizer, EPA Reg. No. 1677-260 (primary)

- Cover letter from applicant to EPA dated August 28, 2020
- Proposed label dated 08/28/20
- Data Matrix (EPA Form 8570-35) dated 08/28/20
- Five efficacy studies (MRIDs 51251001-05)
- Confidential Statement of Formula (EPA Form 8670-4) dated 2/27/19

CW32A RTU, EPA Reg. No. 1677-259 (secondary)

- Cover letter from applicant to EPA dated August 28, 2020
- Proposed label dated 08/28/20
- Data Matrix (EPA Form 8570-35) dated 08/28/20
- Confidential Statement of Formula (EPA Form 8670-4) dated 9/19/19

II AGENCY STANDARDS

EPA expedited review for adding electrostatic spray application directions:

<https://www.epa.gov/pesticide-registration/expedited-review-adding-electrostatic-spray-application-directions-use>

Per 2018 810.2200 guideline, testing for viruses should be conducted using ASTM E1053. In a deviation from the guideline, EPA requested 3 product lots at LCL be tested for SARS-CoV-2.

III PROPOSED DIRECTIONS FOR USE

S&S Sanitizer, EPA Reg. No. 1677-260 (primary)

“TO DISINFECT HARD, NON-POROUS, NON-FOOD CONTACT SURFACES (with spray and non-spray applications):

1. Dilute (this product) (insert product name) to 1.37 – 1.41 fl. oz./gal (in up to 400 ppm hard water).
2. Surfaces must be pre-cleaned (with) (this product) (or) (a suitable cleaner) prior to disinfecting.
3. To disinfect, apply (this product) (insert product name) to surface by (flushing), (mopping), (sponging), (wiping), (or) (by) (hand pump) (coarse) (trigger) (spray) (6-8 inches from surface) to wet surface.

4. Allow surface to remain wet for 10 minutes.
5. Wipe (dry) with a (cloth), (paper towel), (clean mop), (wet vacuum pickup), or allow to air dry. No rinse required (for non-food contact surfaces).
6. Fresh solution must be prepared daily, when the use solution becomes visibly dirty or when the (use) solution tests below disinfection concentration range.

TO DISINFECT HARD, NON-POROUS (FOOD AND NON-FOOD CONTACT) SURFACES (USING SPRAY APPLICATIONS ONLY):

1. Dilute (this product) to 0.52 – 0.55 fl. oz./gal (in up to 500 ppm hard water).
2. Surfaces must be pre-cleaned (with) (this product) (or) (a suitable cleaner) prior to disinfecting. (When (this product) (insert product name) (is) used at this concentration, no rinse is required prior to disinfecting.)
3. To disinfect, apply (this product) (insert product name) to surface by (hand pump) (coarse) (trigger) (spray) (6-8 inches from surface) to wet surface.
4. Allow surface to remain wet for 8 minutes.
5. Wipe (dry) with a (cloth), (paper towel), or allow to air dry. (No (water) rinse required). (A water rinse is not required.)
6. Fresh solution must be prepared daily, when the use solution becomes visibly dirty or when the (use) solution tests below disinfection concentration range.

GENERAL DIRECTIONS FOR USE WITH ELECTROSTATIC SPRAYING

Remove by-standers and pets from the area to be treated. Do not use for treatment of humans, air, or for fumigation. Spray droplet particle size should set to a limit volume median diameter of $\geq 40\mu\text{m}$. Use N95 filtering facepiece respirators. Plan the spray routine to minimize unnecessary exposure to treated areas [for example, begin applying product in the back of the room/area and work towards the front of the room/area]. Place the electrostatic spray function in the ON position for electrostatic spray models that have the functionality to toggle ON/OFF.

FOR USE AS A [MULTI SURFACE] [FOOD] [AND] [NON-FOOD] [CONTACT] [SURFACE] SANITIZER BY ELECTROSTATIC SPRAYING

To sanitize hard, non-porous surfaces, dilute to (0.27 – 0.55 fl oz/ gal). Surfaces must be pre-cleaned (with) (this product) (or) (a suitable cleaner) prior to sanitizing. When (this product) (insert product name) (is) used at this concentration, no rinse is required prior to sanitizing. Apply use solution with electrostatic sprayer to hard, non-porous environmental surfaces. Spray approximately (5 – 7 inches) from the surfaces; making sure to wet surfaces thoroughly. All surfaces must remain wet for the required contact time indicated in the food contact surface sanitizing table, reapplying if necessary. Wipe or let air dry. When using on food contact surfaces, no rinse is required. (This product will kill viruses, including norovirus, on hard, non-porous food contact surfaces when used according to these directions.)

FOR USE AS A [MULTI SURFACE] [FOOD] [AND] [NON-FOOD] [CONTACT] [SURFACE] DISINFECTANT BY ELECTROSTATIC SPRAYING

To disinfect hard, non-porous surfaces, dilute to (0.52 – 0.55 fl oz/ gal). Surfaces must be pre-cleaned (with) (this product) (or) (a suitable cleaner) prior to disinfecting. When (this product) (insert product name) (is) used at this concentration, no rinse is required prior to sanitizing. Apply use solution with electrostatic sprayer to hard, non-porous environmental surfaces. Spray approximately (5 – 7 inches) from the surfaces; making sure to wet surfaces thoroughly. All surfaces must remain wet for the required contact time indicated in the hard surface disinfection (by spray application) table, reapplying if necessary. Wipe or let air dry. When using on food contact surfaces, no rinse is required. (This product will kill viruses, including norovirus, on hard, non-porous food contact surfaces when used according to these directions.).”

“TO DISINFECT HARD, NON-POROUS (FOOD AND NON-FOOD CONTACT) SURFACES:

1. Surfaces must be pre-cleaned (with this product) (or) (a suitable cleaner) prior to disinfecting. (When this product is used as a cleaner, no rinse is required prior to disinfecting.)
2. To disinfect, (apply) (spray) (this product) (insert product name) (to surface by) (hand pump) (coarse) (trigger) (spray) (6-8 inches from (hard, non-porous) surface) (to wet surface).
3. Allow surface to remain wet for 8 minutes.
4. Wipe (dry) with a (disposable) (cloth), (paper towel), or allow to air dry. No (water) rinse required.

GENERAL DIRECTIONS FOR USE WITH ELECTROSTATIC SPRAYING

Remove by-standers and pets from the area to be treated. Do not use for treatment of humans, air, or for fumigation. Spray droplet particle size should set to a limit volume median diameter of $\geq 40\mu\text{m}$. Use N95 filtering facepiece respirators. Plan the spray routine to minimize unnecessary exposure to treated areas [for example, begin applying product in the back of the room/area and work towards the front of the room/area]. Place the electrostatic spray function in the ON position for electrostatic spray models that have the functionality to toggle ON/OFF.

FOR USE AS A [MULTI SURFACE] [FOOD] [AND] [NON-FOOD] [CONTACT] [SURFACE] SANITIZER BY ELECTROSTATIC SPRAYING

To sanitize hard, non-porous surfaces, pre-clean surfaces (with) (this product) (or) (a suitable cleaner) prior to sanitizing. When (this product) (insert product name) (is) used at this concentration, no rinse is required prior to sanitizing. Apply product with electrostatic sprayer to hard, non-porous environmental surfaces. Spray approximately (5 – 7 inches) from the surfaces; making sure to wet surfaces thoroughly. All surfaces must remain wet for the required contact time indicated in the food contact surface sanitizing table, reapplying if necessary. Wipe or let air dry. When using on food contact surfaces, no rinse is required.

(This product will kill viruses, including *Norovirus, on hard, non-porous (food contact) surfaces when used according to these directions.)

FOR USE AS A [MULTI SURFACE] [FOOD] [AND] [NON-FOOD] [CONTACT] [SURFACE] DISINFECTANT BY ELECTROSTATIC SPRAYING

To disinfect hard, non-porous surfaces, pre-clean surfaces (with) (this product) (or) (a suitable cleaner) prior to disinfecting. When (this product) (insert product name) (is) used at this concentration, no rinse is required prior to sanitizing. Apply product with electrostatic sprayer to hard, non-porous environmental surfaces. Spray approximately (5 – 7 inches) from the surfaces; making sure to wet surfaces thoroughly. All surfaces must remain wet for the required contact time indicated in the hard surface disinfection table, reapplying if necessary. Wipe or let air dry. When using on food contact surfaces, no rinse is required.

(This product will kill viruses, including *Norovirus, on hard, non-porous (food contact) surfaces when used according to these directions.)”

IV STUDY SUMMARIES

1.	MRID	51251001	
Study Objective		Disinfectant - virucidal	
Testing Lab; Lab Study ID		Analytical Lab Group – Midwest; A30183	
Experimental Start Date		July 16, 2020	Study Completion Date: August 6, 2020
Test organism(s) <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4+		SARS-Related Coronavirus 2, BEI Resources NR-52281, Strain Isolate USA-WA 1/2020	
Indicator Cell Culture		Vero E6 cells (ATCC CRL-1586)	
Test Method		ASTM E1053-20	
Application Method		Liquid; 2.00 mL aliquot of use-dilution	
Test Substance Preparation	Name/ID	919871	
	Lots <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3	5010EG1800-CL, 5010EG1500-CL and 2210EG2000-CL	
	Preparation	Tested concentration: LCL Tested Dilution: (0.27 oz / gallon) 5010EG1800-CL: 2.10 g test substance + 997.90 g diluent 5010EG1500-CL: 2.10 g test substance + 997.90 g diluent 2210EG2000-CL: 2.07 g test substance + 997.90 g diluent Diluent: 500 ppm AOAC synthetic hard water	
Soil load		1% fetal bovine serum	
Carrier type, # per lot		Glass petri dish; 1	
Test conditions		Contact time: 15 seconds Temperature: 18.0°C Relative humidity: 53.08%	
Neutralizer		Sephadex column	
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, etc.)		n/a	

2.	MRID	51251002	
Study Objective		Disinfectant – virucidal (Electrostatic sprayer)	
Testing Lab; Lab Study ID		Ecolab Shuman Campus, NONGLP 20200014	
Experimental Start Date		June 9, 2020	Study Completion Date: July 1, 2020
Test organism(s) <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4+		Feline calicivirus, ATCC VR-782	
Indicator Cell Culture		CRFK cells (ATCC CCL-94)	
Test Method		Ecolab Protocol: MS505 Version 3.0 (ASTM E1053-20 modified for electrostatic spray application)	
Application Method		Electrostatic spray at 7 inches for 2 seconds 5010EG1800 MMB62027: 1.83 g average 5010EG1500 MMB65028: 1.80 g average	
Test Substance Preparation	Name/ID	S&S Sanitizer (919871)	
	Lots <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3	5010EG1800 MMB62027 and 5010EG1500 MMB65028	
	Preparation	Tested concentration: LCL Tested Dilution: (0.27 oz / gallon)	

		5010EG1800 MMB62027: 2.10 g product + 997.89 g diluent 5010EG1500 MMB65028: 2.11 g product + 997.89 g diluent Diluent: 400 ppm AOAC synthetic hard water
Soil load		None
Carrier type, # per lot		Glass petri dish; 1
Test conditions		Contact time: 30 seconds Temperature: 15-30°C Relative humidity: not reported
Neutralizer		Sephadex column
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, etc.)		The study was not conducted under GLP. Electrostatic Sprayer Identity: Victory Cordless Electrostatic Handheld Sprayer

3.	MRID	51251003	
Study Objective		Disinfectant – bactericidal (Electrostatic sprayer)	
Testing Lab; Lab Study ID		Ecolab Shuman Campus, NONGLP 20200019	
Experimental Start Date	6/16/20	Study Completion Date:	6/30/20
Test organism(s) <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4+		<i>Staphylococcus aureus</i> (ATCC 6538), <i>Salmonella enterica</i> (ATCC 10708)	
Test Method		Ecolab Protocol: MS010 ASTM E1053 modified for electrostatic spray	
Application Method		Electrostatic spray at 7 inches for 2 seconds 5010EG1800 MMB62027: 2.25 g average 5010EG1500 MMB65028: 2.12 g average	
Test Substance Preparation	Name/ID	S&S Sanitizer (919871)	
	Lots <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3	5010EG1800 MMB62027 and 5010EG1500 MMB65028	
	Preparation	Tested concentration: LCL Tested Dilution: 0.52 oz / gallon 5010EG1800 MMB62027: 4.10 g product + 995.90 g diluent 5010EG1500 MMB65028: 4.07 g product + 995.93 g diluent Diluent: 400 ppm AOAC synthetic hard water	
Soil load		None	
Carrier type, # per lot		Glass slides, 10	
Test conditions		Contact time: 8 minutes Temperature: 15-30°C Relative humidity: not reported	
Neutralizer		Lethen broth	
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, etc.)		The study was not conducted under GLP. Electrostatic Sprayer Identity: Victory Cordless Electrostatic Handheld Sprayer	

V STUDY RESULTS

Disinfection – Virucidal Efficacy

MRID	Organism	Description	Results			Dried Virus Control (Log ₁₀ TCID ₅₀ /carrier)
			Lot 5010EG1800-CL	Lot 5010EG1500-CL	Lot 2210EG2000-CL	
15 seconds, 0.27 oz / gallon in 500 ppm hard water, 1% FBS						
51251001	Severe Acute Respiratory Syndrome-Related Coronavirus 2 (SARS-Related Coronavirus 2), BEI Resources NR-52281, Strain Isolate USA-WA1/2020	10 ⁻¹ to 10 ⁻⁶ dilution*	Complete inactivation	Complete inactivation	Complete inactivation	5.55
		Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80	≤ 0.80	
		Log Reduction	≥ 4.75	≥ 4.75	≥ 4.75	

*Dilution refers to the fold of dilution from the virus inoculum. Post neutralized sample was considered the 10⁻¹ dilution.

MRID	Organism	Description	Results		Dried Virus Control (Log ₁₀ TCID ₅₀ /carrier)
			Lot 5010EG1800 MMB62027	Lot 5010EG1500 MB65028	
30 seconds, 0.27 oz / gallon of 400 ppm hard water, no soil; electrostatic spray application					
51251002	Feline calicivirus (ATCC VR-782)	10 ⁻¹ to 10 ⁻⁵ dilution*	Complete inactivation	Complete inactivation	6.05
		Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80	
		Log Reduction	≥ 5.25	≥ 5.25	

Disinfection – Bactericidal Efficacy

Disinfection - Bactericidal Enzyme				
MRID	Organism	No. Exhibiting Growth/Total No. Tested		Average log ₁₀ CFU/ Carrier
		Lot 5010EG1800 MB62027	Lot 5010EG1500 MB65028	
8 minutes, 0.52 oz / gallon of 400 ppm hard water, no soil; electrostatic spray application				
51251003	<i>Staphylococcus aureus</i> (ATCC 6538)	0/10	0/10	6.51
	<i>Salmonella enterica</i> (ATCC 10708)	0/10	0/10	4.98

Wetness Testing

In addition to the efficacy testing, the registrant also conducted wetness testing to demonstrate that the surface remains visibly wet over the duration of the contact time. Pictures were provided as well as weight measurements.

MRID	80 micron ESS after 2-second Application
At 5 inches; 8 minutes, 0.52 oz/gallon of 400 ppm hard water	
51251004	Pass: Confirmed visual and gravimetric wetness Average: 3.53 g
At 5 inches; 30 seconds, 0.27 oz/gallon of 400 ppm hard water	
51251004	Pass: Confirmed visual and gravimetric wetness Average: 3.51 g
At 7 inches; 8 minutes, 0.52 oz/gallon of 400 ppm hard water	
51251005	Pass: Confirmed visual and gravimetric wetness Average 2.11 g
At 7 inches; 30 seconds, 0.27 oz/gallon of 400 ppm hard water	
51251005	Pass: Confirmed visual and gravimetric wetness Average: 1.63 g

VI STUDY CONCLUSIONS

MRID	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	Diluent	Organism(s)	Data support tested conditions?
51251001	Disinfectant, virucidal	Hard, non-porous surfaces	RTU liquid, diluted to 0.27 oz per gallon	15 seconds	1%	500 ppm hard water	<ul style="list-style-type: none"> Severe Acute Respiratory Syndrome-Related Coronavirus 2 (SARS-Related Coronavirus 2), BEI Resources NR-52281, Strain Isolate USA-WA1/2020 	Yes
51251003	Disinfectant, bactericidal	Hard non-porous surface	Electrostatic spray at 5-7 inches for 2 seconds; diluted 0.52 oz per gallon	8 minutes	none	400 ppm hard water	<ul style="list-style-type: none"> <i>Staphylococcus aureus</i> (ATCC 6538) <i>Salmonella enterica</i> (ATCC 10708) 	Yes
51251002	Disinfectant, virucidal	Hard non-porous surface	Electrostatic spray at 5-7 inches for 2 seconds; diluted 0.27 oz per gallon	30 seconds	none	400 ppm hard water	<ul style="list-style-type: none"> Feline calicivirus (Surrogate for Human Norovirus), Strain: F9, (ATCC VR-782) 	Yes

VII LABEL COMMENTS

Label Date: 08/28/20

1. The proposed labels claim that the products, S&S Sanitizer, when diluted at 0.27 oz. per gallon of water and the CW32A – RTU, when ready-to-use, are effective disinfectants against the following on precleaned, hard, non-porous surfaces for a 15 second contact time:

Severe Acute Respiratory Syndrome-Related Coronavirus 2 (SARS-Related Coronavirus 2), BEI Resources NR-52281, Strain Isolate USA-WA1/2020

These claims are **acceptable** as they are supported by the submitted data.

2. The proposed labels claim that the product, S&S Sanitizer, when diluted at 0.52 oz. per gallon of water, and CW32A – RTU, when ready-to-use, are effective disinfectants with bactericidal activity against the following as electrostatic sprays on precleaned, hard, non-porous surfaces for an 8-minute contact time:

Staphylococcus aureus (ATCC 6538)
Salmonella enterica (ATCC 10708)

These claims are **acceptable** as they are supported by the submitted data.

3. The proposed labels claim that the product, S&S Sanitizer, when diluted at 0.27 oz. per gallon of water, and CW32A – RTU, when ready-to-use, are effective disinfectants with virucidal activity against the following as electrostatic sprays on precleaned, hard, non-porous surfaces for a 30 second contact time:

Feline calicivirus (Surrogate for Human Norovirus), Strain: F9, (ATCC VR-782)

These claims are **acceptable** as they are supported by the submitted data.

4. Make the following changes to the proposed labels (page numbers may vary – the following page numbers are based on the label for EPA reg no. 1677-260):
 - a. Throughout the label, recommend revising use directions to specify that surface should remain visibly wet for the contact time, as a clear indicator for end users.
 - b. On page 4, revise “heavily soiled” to “visibly soiled”.
 - c. On page 7, remove use directions for sanitizing as an electrostatic sprayer. Confirmatory data was only submitted to support disinfection claims.
 - d. On page 9,
 - i. remove “All-in-one” as it is overly broad and potentially misleading. This claim is not permitted per the Label Review Manual.
 - ii. Revise “works quickly” to “cleans quickly” or similarly clarify this claim to be specific to cleaning.
 - iii. Remove “(Helps) ensure (regulatory) (health department) (Food Code) compliance” from cleaning claims. This may be moved to public health claims.
 - e. On page 10,
 - i. recommend removal of “bacteria -fighting” as this may be misleading regarding the activity of the product.

- ii. Qualify “germicide” and “germicidal” per the agency’s policy for germ claims: <https://www.epa.gov/pesticide-labels/use-term-germs-antimicrobial-labels>.
- f. On page 12,
 - i. remove brackets around “hard nonporous surfaces” for SARS CoV 2 claims. Ensure that each SARS CoV 2 claim is clearly linked to hard nonporous surfaces.
 - ii. in the last bullet for SARS CoV 2 claims, remove parenthesis from “(reduce the spread of)” and add “between treated hard nonporous surfaces”
 - iii. remove “all-in-one” (see d.i.).
- g. On page 14, under the “Use Sites” table, remove parenthesis around required qualifiers such as “non wood” or “exteriors”.
- h. On pages 14-15, for sites such as “walk in refrigerators”, “beverage dispensing equipment”, “(refrigerated) food storage display”, “chiller tanks”, “freezers”, “ice chests”, “ice machines”, “ice scoops”, “refrigerator bins”, “refrigerators”, “Slurpee/ICEE machines”, “soft serve ice cream/yogurt machines”, “steam tables”, “stove tops”, and “toasters” specify that surfaces should come to room temperature for treatment or ensure efficacy data supports claims at representative temperatures.
- i. On page 17, update EVP language for consistency:

“This product qualifies for emerging viral pathogen claims per the EPA’s ‘Guidance to Registrants: Process for Making Claims Against Emerging Viral Pathogens not on EPA-Registered Disinfectant Labels’ when used in accordance with the appropriate use directions indicated below.

This product meets the criteria to make claims against certain emerging viral pathogens from the following viral categories:

- Enveloped Viruses
- Large Non-Enveloped Viruses
- Small Non-Enveloped Viruses

<i>For an emerging viral pathogen that is a/an...</i>	<i>...follow the directions for use for the following organisms on the label:</i>
Enveloped virus	Norovirus (Feline calicivirus surrogate) (ATCC VR-782), Strain F-9
Large, non-enveloped virus	Norovirus (Feline calicivirus surrogate) (ATCC VR-782), Strain F-9
Small, non-enveloped virus	*Norovirus (Feline calicivirus surrogate) (ATCC VR-782), Strain F-9 Rhinovirus (ATCC VR-1607)

Acceptable claim language:

[Product name] has demonstrated effectiveness against viruses similar to ***[name of emerging virus]*** on hard, non-porous surfaces. Therefore, ***[product name]*** can be used against ***[name of emerging virus]*** when used in accordance with the directions for use against ***[name of supporting virus(es)]*** on hard, non-porous surfaces. Refer to the ***[CDC or OIE]*** website at ***[pathogen-specific website address]*** for additional information.

[Name of illness/outbreak] is caused by ***[name of emerging virus]***. ***[Product name]*** kills similar viruses and therefore can be used against ***[name of emerging virus]*** when used in accordance with the directions for use against ***[name of supporting virus(es)]*** on hard, non-porous surfaces. Refer to the ***[CDC or OIE]*** website at ***[website address]*** for additional information.”